

EXHIBIT C

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO

3 -----
4 KENNETH CHAPMAN, JESSICA :
5 VENNEL, and JASON JACKSON, :
6 on behalf of themselves and :
7 all others similarly situated, :
8 :
9 Plaintiffs, :
10 : Case No.:
11 vs. :
12 : 1:16-CV-1114
13 TRISTAR PRODUCTS, INC., :
14 :
15 Defendant. :
16 -----

17 Washington, D.C.

18 Tuesday, December 20, 2016

19 Videotaped Deposition of:

20 ALEJANDRO LOZANO

21 called for oral examination by counsel for
22 Plaintiffs, pursuant to notice, at Venable, LLP, 575
7th Street, N.W., Washington, D.C., before Felicia
A. Newland, CSR, of Veritext Legal Solutions, a
Notary Public in and for the District of Columbia,
beginning at 10:01 a.m., when were present on behalf
of the respective parties:

1 A P P E A R A N C E S

2 On behalf of Plaintiff:

3 MARK E. SILVEY, ESQUIRE
4 Greg Coleman Law, PC
5 800 S. Gay Street, Suite 1100
6 Knoxville, Tennessee 37929
7 mark@gregcolemanlaw.com

8 On behalf of Defendant:

9 HUGH J. BODE, ESQUIRE
10 Reminger Attorneys at Law
11 1400 Midland Building
12 101 Prospect Avenue West
13 Cleveland, Ohio 44115
14 hbode@reminger.com

15 -- and --

16 JOE A. SHULL, ESQUIRE
17 Venable, LLP
18 575 7th Street, N.W.
19 Washington, D.C. 20004
20 jashull@venable.com

21 -- and --

22 BRIAN E. ROOF, ESQUIRE (Telephonically)
Sutter O'Connell
1301 East 9th Street
Cleveland, Ohio 44114
broof@sutter-law.com

Also Present:

Graham Davis, Videographer

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1 A Yeah. 12:14:05

2 Q Did you have any role in preparing that? 12:14:06

3 A No. This was prepared by Jesse, 12:14:10

4 probably. The factual information was -- I -- I

5 don't know where it comes from. I -- I think this

6 was prepared by somebody else.

7 Q Okay. 12:14:24

8 A I was not directly involved in the 12:14:24

9 preparation of this.

10 Q Okay. You said that some -- has Tristar 12:14:28

11 reported some incidents to the CPSC?

12 A Yes. 12:14:34

13 Q Okay. Tell me who did that. Did you do 12:14:35

14 that? What department did that?

15 A Well, after customer service got the 12:14:39

16 incident reports, we passed that -- since

17 they're -- some of them are injuries, some of them

18 are property damage, or things of that nature, we

19 escalate that.

20 We put our best effort in trying to find 12:14:55

21 out what happened. To this point, by all the

22 testing that we have done, we haven't come to a

1 conclusion or find any defect. So we reported to
2 Joe Shull, and Joe advised --

3 Q Wait. Don't tell me what conversations 12:15:13
4 you've had with your attorneys, because that's
5 privileged. You can't tell me that.

6 A Okay. 12:15:18

7 Q Just tell me what happened with the -- 12:15:19

8 A Then we reported to the Consumer Product 12:15:21
9 Safety Commission.

10 Q Okay. And as I understand it, the 12:15:24
11 Consumer Product Safety Commission has opened an
12 investigation of some of the units?

13 A I don't know that. I don't know if they 12:15:31
14 have opened an investigation.

15 Q Okay. Who would? At Tristar, who would? 12:15:34

16 A At Tristar? 12:15:38

17 Q Okay. 12:15:39

18 A It would have been me. 12:15:40

19 Q Okay. Has your attorney advised you -- 12:15:42
20 or, actually, let me do this. Let mark this as the
21 next number.
22

1 CERTIFICATE OF NOTARY PUBLIC

2 I, FELICIA A. NEWLAND, CSR, the officer before
3 whom the foregoing videotaped deposition was taken,
4 do hereby certify that the witness whose testimony
5 appears in the foregoing videotaped deposition was
6 duly sworn by me; that the testimony of said witness
7 was taken by me in stenotype and thereafter reduced
8 to typewriting under my direction; that said
9 deposition is a true record of the testimony given
10 by said witness; that I am neither counsel for,
11 related to, nor employed by any of the parties to
12 the action in which this deposition was taken; and,
13 further, that I am not a relative or employee of any
14 counsel or attorney employed by the parties hereto,
15 nor financially or otherwise interested in the
16 outcome of this action.

17 <%Signature%>

18 _____
19 FELICIA A. NEWLAND, CSR
20 Notary Public for the
21 District of Columbia

22 My commission expires:
August 14, 2019